



Solutia Inc.  
702 Clydesdale Avenue  
Anniston, Alabama 36201 USA

January 8, 2020

Ms. Pamela J. Langston Scully, P.E.  
Remedial Project Manager  
United States Environmental Protection Agency, Region IV  
Atlanta Federal Center  
61 Forsyth St.  
Atlanta, GA 30303-8960

**RE: December 2020 Progress Report  
Anniston PCB Site (Docket No. 1:02-cv-0749-KOB)  
Anniston, Alabama**

Dear Ms. Langston Scully:

Please find attached the December 2020 Progress Report for the Partial Consent Decree between Solutia Inc., Pharmacia LLC (collectively P/S) and the United States Environmental Protection Agency (EPA) entered by the United States District Court for the Northern District of Alabama (Court) on August 4, 2003 and the Consent Decree for Remedial Design/Remedial Action for Operable Unit No. 3 between P/S and the EPA entered by the Court on April 17, 2013. This report describes the work performed, unanticipated issues encountered, and analytical data received during the reporting period of December 1, 2020 through December 31, 2020. The report also describes upcoming developments anticipated for the months of January and February 2021.

If you should have any questions concerning this matter or need additional information, please call me at (256) 231-8404.

Sincerely,

E. Gayle Macolly  
Manager, Remedial Projects  
Solutia Inc.

Attachments

cc: Ms. Sonja Favors (ADEM)  
Mr. Thomas Dahl



**DECEMBER 2020 PROGRESS REPORT**

**ANNISTON PCB SITE**

**(DOCKET NO. 1:02-cv-0749-KOB)**

**ANNISTON, ALABAMA**

USEPA I.D. No. ALD 004 019 048

Submitted For:

**Solutia Inc. and Pharmacia LLC**

**702 Clydesdale Avenue**

**Anniston, Alabama 36201**

January 8, 2021

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## **1.0 INTRODUCTION**

### **1.1 2003 Partial Consent Decree**

This monthly progress report has been prepared in accordance with the requirements of the 2003 Partial Consent Decree (2003 CD) between the United States Environmental Protection Agency (EPA), Solutia Inc. (Solutia), and Pharmacia LLC (Pharmacia) entered by the United States District Court for the Northern District of Alabama (the Court) on August 4, 2003 (Docket No. 1:02-cv-0749-KOB). The 2003 CD was issued under Sections 106, 107, and 113(g)(2) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. §§9606, 9697, §9613(g)(2). The 2003 CD provides for the performance of studies and response work by Solutia and Pharmacia at the Anniston PCB Site (Site) as defined by the 2003 CD. Solutia and Pharmacia, with Monsanto performing work on behalf of Pharmacia, are referred to as “P/S” in the subsequent sections of this report.

In accordance with Appendix A Section XIII (47), Appendix B Task 2, and Appendix G Section VI (2.5) of the 2003 CD, Section 2.0 of this report describes the work performed during the period of December 1, 2020 through December 31, 2020, including actions taken, unanticipated issues, if applicable, and analytical data received during the reporting period. Section 4.1 of this report also describes upcoming developments anticipated over the next two months for the work required by the 2003 CD, including scheduled dates of actions to be performed and planned resolutions of past or anticipated problems, if applicable.

### **1.2 2013 Operable Unit 3 (OU-3) Remedial Design/Remedial Action Consent Decree**

The Consent Decree for the Remedial Design/Remedial Action for Operable Unit 3 (OU-3 RD/RA CD) between the EPA and P/S was entered by the Court on April 17, 2013 (Docket No. 1:02-cv-0749-KOB). The OU-3 RD/RA CD, which encompasses the Solutia plant and the adjacent closed South and West Landfills, provides for the implementation of the remedies selected for OU-3 as described in the Interim Record of Decision (IROD) issued by Region 4 of the EPA on September 29, 2011.

In accordance with Section X. Paragraph 31 of the OU-3 RD/RA CD, Section 3.0 of this report describes the work performed for the OU-3 RD/RA during the period of December 1, 2020 through

December 31, 2020, including actions taken, unanticipated issues, if applicable, and analytical data received during the reporting period. Section 4.2 of this report describes the upcoming developments anticipated over the next two months for the work required by the OU-3 RD/RA CD, including scheduled dates of actions to be performed and planned resolutions of past or anticipated problems, if applicable.

## **2.0 2003 CD WORK PERFORMED DURING REPORTING PERIOD**

### **2.1 General 2003 CD Activities**

#### **2.1.1 Administrative Submittals**

A 2003 CD submittal schedule for the Site that includes this reporting period's submittals and/or submittals awaiting approval or response is included as Table 1. This schedule includes the dates that documents were submitted to the EPA and the dates that approvals or comments were received from the EPA.

### **2.2 Operable Unit 1/Operable Unit 2 (OU-1/OU-2)**

#### **2.2.1 General**

The Proposed Remedial Design/Remedial Action (RD/RA) Consent Decree for OU-1/OU-2 of the Anniston PCB Site was lodged by the Department of Justice with the Courts on December 2, 2020 and noticed in the Federal Register on December 8, 2020. This RD/RA Consent Decree will undergo a sixty (60) day public comment period which is set to expire on February 8, 2021.

#### **2.2.2 Residential Removal Properties Program**

The residential program consists of residential work associated with the 2003 CD. This includes the non-time critical (NTC) residential activities as well as time critical residential activities associated with the Administrative Order on Consent (AOC), effective October 5, 2001.

During this reporting period, P/S completed the annual field surveys in accordance with the approved NTC Removal Action Interim IC Program for Residential Properties (Interim IC Program). Informational devices will be submitted to property owners and tenants currently included in the Interim IC Program in January 2021.

##### **2.2.2.1 Residential Removal Access**

Access activity includes updating owner/tenant information, access request information, and/or EPA notification of non-compliance information. During this reporting period, there were no access activities.

Currently there are 12 residential properties in the Residential Removal Properties Program where access has not been granted and one property where access has been granted for a removal action. The properties are summarized in Table 3, and a description of each property's status is presented in Table 4.

#### **2.2.2.2 Residential Removal Activities**

During this reporting period, P/S did not perform any surface or depth sampling.

During this reporting period, P/S' residential removal contractor Allen Hall Excavating completed a removal action at 1209 Crawford Avenue located in Zone C.

P/S continued to perform the required routine inspections of the Central Staging and Soil Management Area (CSSMA) and South Staging and Soil Management Area (SSSMA) during this reporting period. No adverse findings were noted during the inspections.

#### **2.2.3 OU-1/OU-2 Non-Residential Program**

There was no activity during this reporting period.

### **2.3 11<sup>th</sup> Street Ditch**

During this reporting period, P/S performed the quarterly routine inspections as described in the 11<sup>th</sup> Street Ditch Operations and Maintenance Plan. No adverse findings were noted. P/S will perform the next quarterly routine inspections in March 2021.

### **2.4 Operable Unit 4 (OU-4)**

Currently there is one residential property in the OU-4 Residential Removal Properties Program where access has not been granted. The property's status is presented in Table 5.

During this reporting period, P/S continued to provide construction support for the Dewatering Facility project at the Choccolocco Creek Waste Water Treatment Plant in accordance with the approved construction support work plan. This project is scheduled to be completed by May 2021.



## **2.5 Technical Assistance Plan Grant**

The Technical Advisor, Mr. Bertrand Thomas, P.G., continues to review Site-related documents and convey information from these documents to the CAG and the community.

## **2.6 Community Advisory Group**

There was no CAG meeting scheduled for December 2020. The next CAG meeting is scheduled for January 12, 2021 and will be held via video teleconference.

### **3.0 OU-3 RD/RA CD WORK PERFORMED DURING REPORTING PERIOD**

#### **3.1 General OU-3 RD/RA CD Activities**

##### **3.1.1 Administrative Submittals**

A CD submittal schedule for OU-3 that includes this reporting period's submittals and/or submittals awaiting approval or response is included as Table 6.

#### **3.2 Remedial Action**

P/S are currently preparing a revised Institutional Controls Implementation and Assurance Plan (ICIAP) that documents the final remedial components performed as part of the completed RA work. The revised ICIAP will include an executed Environmental Covenant as required by the IROD.

## **4.0 WORK SCHEDULED**

### **4.1 2003 CD Work Activities**

During the months of January and February 2021, the following work elements are anticipated:

- Obtain and/or process access for performing residential sampling and removal activities in OU-1/OU-2 according to the Supplemental Sampling and Analysis Plan (SSAP) and the Addendum to the NTC Removal Action Work Plans for the Site (as necessary);
- Perform surface, depth, indoor dust and/or crawl space sampling of residential properties in OU-1/OU-2 as access is provided (as necessary);
- Perform residential removal activities according to the associated work plans (as necessary);
- Prepare and submit the annual informational devices in accordance with the Interim IC Program;
- Perform CSSMA and SSSMA inspection and maintenance requirements in accordance with the approved CSSMA Operating and Closure Plan, the approved SSSMA Operating and Closure Plan, and the SSSMA Interim Operations and Maintenance Plan;
- Provide construction support for the Quintard Mall redevelopment project (as necessary);
- Provide construction support for the Dewatering Facility project at the Choccolocco Creek Waste Water Treatment Plant (as necessary);
- Respond to the EPA's comments, as necessary, on deliverables submitted to the EPA for approval; and
- The CAG will hold a regularly scheduled meeting on January 12, 2021.

### **4.2 OU-3 RD/RA CD Work Activities**

During the months of January and February 2021, the following work elements are anticipated:

- Prepare and submit a revised ICIAP.

## TABLES

**TABLE 1**  
**PARTIAL CONSENT DECREE SUBMITTAL SCHEDULE**  
**ANNISTON PCB SITE**  
*Anniston, Alabama*

**Administrative Issues**

OU-1/OU-2 RD/RA Consent Decree	Noticed in Federal Register	December 8, 2020
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**Reports**

Updated Interim Operations and Maintenance Plan (2012) - South Staging and Soil Management Area	Submitted to EPA <b>Approval Pending</b>	May 2, 2012
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site	Submitted to EPA <b>Comments Received</b> <b>Revision Submitted</b>	July 31, 2012 May 16, 2013 November 12, 2015
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 1	Submitted to EPA	August 3, 2016
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 2	Submitted to EPA	July 14, 2017
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 3	Submitted to EPA	June 4, 2018
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 4	Submitted to EPA	June 26, 2019
NTC Removal Action Completion Report for Residential Properties at the Anniston PCB Site, Addendum No. 5	Submitted to EPA <b>Approval Pending</b>	April 24, 2020
South Staging and Soil Management Area, Interim Closure Report - Addendum No. 7	Submitted to EPA <b>Approval Pending</b>	June 4, 2018
West 11th Street Sewer Line Repair Construction Completion Report - City of Anniston Water Works and Sewer Board	Submitted to EPA <b>Approval Pending</b>	June 12, 2018
Snow Street Drainage Improvement Project Completion Report Closure Report - Addendum No. 1	Submitted to EPA <b>Approval Pending</b>	July 10, 2019
Technical Memorandum Summarizing Results of Comparative Analysis of Alternatives, OU-4 Anniston PCB Site	Submitted to EPA <b>Approval Pending</b>	July 13, 2020
OU-4 Sediment Stability Technical Memorandum	Submitted to EPA <b>Approval Pending</b>	June 30, 2010
Former Holiday Inn Redevelopment Project Completion Report <sup>(1)</sup>	Submitted to EPA <b>Approval Pending</b>	November 20, 2013
Miracle Field Construction Completion Report <sup>(1)</sup>	Submitted to EPA <b>Approval Pending</b>	June 19, 2014
Anniston Regional Airport Fence Installation Project Completion Report <sup>(1)</sup>	Submitted to EPA <b>Approval Pending</b>	July 23, 2014
Interstate 20 (I-20) Bridge System Over Snow Creek Remedial Measures Completion Report <sup>(1)</sup>	Submitted to EPA <b>Approval Pending</b>	October 7, 2014
Colonial Pipeline Company Recoating Project Completion Report <sup>(1)</sup>	Submitted to EPA <b>Approval Pending</b>	November 5, 2014
November 2020 Progress Report	Submitted to EPA	December 9, 2020

**Work Plan**

Quintard Mall Redevelopment Construction Support Workplan	Submitted to EPA <b>Approval Pending</b>	June 23, 2020
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**Notes:**

<sup>(1)</sup> The approval is pending the completion of the Remedial Investigation/Feasibility Study process for OU-4.

**TABLE 2**

**INTERIM IC GROUP COUNTS  
ANNISTON PCB SITE  
Anniston, Alabama**

<b>Area</b>	<b>IC Group 2<sup>1</sup></b>	<b>IC Group 3<sup>2</sup></b>	<b>IC Group 4<sup>3</sup></b>	<b>Total</b>
OU-1/2	326	100	50	<b>476</b>
OU-4	5	5	1	<b>11</b>
<b>Total</b>	<b>331</b>	<b>105</b>	<b>51</b>	<b>487</b>

<sup>1)</sup> IC Group 2 includes properties where residual PCB-containing soil may remain on the property but such presence has not been confirmed (e.g., PCBs beneath structures or driveways).

<sup>2)</sup> IC Group 3 includes properties where PCB levels in the surficial soil are less than 1 ppm, but are between 1 and 10 ppm at 12 inches or more below the existing ground surface. IC Group 3 properties may also include improvements (e.g., houses, driveways) where residual PCB-containing soil may remain on the property but such presence has not been confirmed.

<sup>3)</sup> IC Group 4 includes properties where PCB levels in the surficial soil are greater than 1 ppm and have not been remediated (due to access issues or unsuitable areas). IC Group 4 properties may also include improvements (e.g., houses or driveways) where residual PCB-containing soil may remain on the property but such presence has not been confirmed, and/or the property may contain PCBs between 1 and 10 ppm at 12 inches or more below the existing ground surface.

IC: Institutional Controls

PCBs: polychlorinated biphenyls

ppm: parts per million

TABLE 3

## OU-1 RESIDENTIAL PROGRAM SUMMARY

## ANNISTON PCB SITE

Anniston, Alabama

<b>Residential Removal Action Program (Evaluation Areas 1-35) <sup>(1)</sup></b>		<b>December 2020</b>
No. of properties where access has been requested to surface sample		0
No. of properties where owners/tenants have been contacted for additional sampling and/or removal activities		0
No. of properties where total access has been granted to surface sample		0
No. of properties where access has been requested for removal action activities		0
No. of properties where total access has been granted for removal action activities		0
No. of properties surface sampled in the footprint of a former structure/unsuitable area		0
No. of properties where depth, dust, and/or crawlspace samples were collected		0
No. of properties where validated analytical results were received		0
No. of properties where removal actions have been completed		1
No. of properties where removal actions are in progress		0
<b>Total no. of properties with PCB surface results &lt; 1 ppm</b>		<b>1231</b>
<b>Total no. of properties with PCB surface results ≥ 1 ppm <sup>(2)(3)</sup></b>		<b>11</b>
<b>Total no. of removal action properties Unsuitable for Removal</b>		<b>19</b>
<b>Total no. of removal action properties where removals have been completed by Solutia (Additional Unsuitable Areas Remain)</b>		<b>10</b>
<b>Total no. of removal action properties completed by Solutia (as part of AOC and CD) <sup>(3)(4)</sup></b>		<b>375</b>
<b>Total no. of &gt; 1 ppm PCBs removal action properties completed by EPA (confirmed)</b>		<b>8</b>
<b>Residential Removal Action Program (Special Use Properties - Evaluation Areas 1-35)</b>		<b>December 2020</b>
No. of properties where access has been requested for removal action activities		0
No. of properties where total access has been granted for removal action activities		0
No. of properties where depth, dust, crawlspace, and/or demo samples were collected		0
No. of properties where validated analytical results were received		0
No. of properties where removal actions have been completed		0
No. of properties where removal actions are in progress		0
<b>Total no. of properties with PCB surface results &lt; 1 ppm in High Activity Areas</b>		<b>24</b>
<b>Total no. of removal action properties completed by Solutia (as part of AOC and CD)</b>		<b>9</b>
<b>Residential Removal Action Program (Lead Site AOC Zone A)</b>		<b>December 2020</b>
No. of properties where access has been requested to surface sample		0
No. of properties where total access has been granted to surface sample		0
No. of properties where access has been requested for removal action activities		0
No. of properties where owners/tenants have been contacted for additional sampling and/or removal activities		0
No. of properties where total access has been granted for removal action activities		0
No. of properties surface sampled in the footprint of a former structure/unsuitable area		0
No. of properties where depth, dust and/or crawlspace samples were collected		0
No. of properties where validated analytical results were received		0
No. of properties transferred from the Foothills Community Partnership and/or EPA		0
No. of properties where removal actions have been completed		0
No. of properties where removal actions are in progress		0
<b>Total no. of properties with PCB surface results &lt; 1 ppm sampled by Solutia and/or EPA</b>		<b>440</b>
<b>Total no. of properties with PCB surface results ≥ 1 ppm and Lead &lt;400 ppm</b>		<b>1</b>
<b>Total no. of Special Use properties with PCB surface results ≥ 1 ppm and Lead &lt;400 ppm in High Activity Areas</b>		<b>0</b>
<b>Total no. of removal action properties completed by Solutia (as part of AOC and CD)</b>		<b>81</b>
<b>Total no. of removal action properties where removals have been completed by Solutia (Additional Unsuitable Areas Remain)</b>		<b>2</b>
<b>Total no. of removal action properties Unsuitable for Removal</b>		<b>2</b>

**TABLE 3**  
**OU-1 RESIDENTIAL PROGRAM SUMMARY**  
**ANNISTON PCB SITE**  
*Anniston, Alabama*

<b>Residential Removal Action Program (Lead Site AOC Zone B)</b>	<b>December 2020</b>
No. of properties where access has been requested to surface sample	0
No. of properties where total access has been granted to surface sample	0
No. of properties where access has been requested for removal action activities	0
No. of properties where owners/tenants have been contacted for additional sampling and/or removal activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties surface sampled in the footprint of a former structure/unsuitable area	0
No. of properties where depth, dust and/or crawlspace samples were collected	0
No. of properties where validated analytical results were received	0
No. of properties transferred from the Foothills Community Partnership and/or EPA	0
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
<b>Total no. of properties with PCB surface results &lt; 1 ppm sampled by Solutia and/or EPA</b>	<b>525</b>
<b>Total no. of properties with PCB surface results ≥ 1 ppm and Lead &lt;400 ppm</b>	<b>1</b>
<b>Total no. of Special Use properties with PCB surface results ≥ 1 ppm and Lead &lt;400 ppm in High Activity Areas</b>	<b>0</b>
<b>Total no. of removal action properties completed by Solutia (as part of AOC and CD)</b>	<b>120</b>
<b>Total no. of removal action properties Unsuitable for Removal</b>	<b>3</b>

Notes:

<sup>(1)</sup> Evaluation Areas 1-34 also represents the Lead Site AOC Zones C and D.

<sup>(2)</sup> Includes properties surface sampled by EPA. Does not include completed removal properties or EPA Lead Site Appendix 6 properties.

<sup>(3)</sup> This total includes three properties where removals have previously been completed, but additional removals are required.

<sup>(4)</sup> This total includes 3 Appendix 6 properties within Evaluation Areas 1-35 where removals were completed by Solutia.



TABLE 4

**PROPERTY STATUS FOR RESIDENTIAL PROPERTIES WITH GREATER THAN 1 PPM PCBs RESULTS  
FOR SURFACE COMPOSITE SAMPLES IN ZONES A - D  
ANNISTON PCB SITE  
Anniston, Alabama**

ADDRESS	GIS PARCEL ID	EVALUATION AREA	EPA Zone	PROPERTY STATUS
918 McDaniel Avenue	2217	11	D	Non-Responsive
621 Pine Street <sup>(2)</sup>	2820	3	C	Non-Responsive
1407 Glen Addie Avenue <sup>(2)</sup>	765	24	C	Non-Responsive
509 W. 13th Street	1136	24	C	Non-Responsive
916 McDaniel Avenue	2254	11	D	Owner Declined Access During Removal Initiation
124 W. 18th Street	207123	-	A	Owner Declined Access During Removal Initiation
1627 W. 13th Street	1061	21	C	Owner Declined Removal Access
2106 W. 10th Street	2128	15	D	Owner Declined Removal Access
3002 Jefferson Street	3410	-	B	Owner Declined Removal Access
807 Bancroft Avenue	2443	34	D	Owner Declined Removal Access
716 Montrose Avenue <sup>(2)</sup>	2500	11	D	Owner Not Found
Duncan Avenue (11-22-01-01-04-2-77) <sup>(1)</sup>	973	21	C	Owner Not Found
300 Monsanto Road <sup>(1)</sup>	4342	12	C	Owner Granted Removal Access, Depth Sampling Pending

Notes:

<sup>(1)</sup> Portions of property are no longer unsuitable for removal.

<sup>(2)</sup> Property requires additional removal action.

**TABLE 5**

**PROPERTY STATUS FOR RESIDENTIAL PROPERTIES WITH GREATER THAN 1 PPM PCBs AND LESS THAN 400 PPM LEAD RESULTS  
FOR SURFACE COMPOSITE SAMPLES IN OU-4  
ANNISTON PCB SITE  
*Anniston, Alabama***

ADDRESS	GIS PARCEL ID	PROPERTY STATUS
0 Howard Drive (07-06-14-0-000-004.00)	600117	Owner Declined Removal Access

TABLE 6

**OU-3 CONSENT DECREE SUBMITTAL SCHEDULE**  
**ANNISTON PCB SITE**  
*Anniston, Alabama*

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**Administrative Issues**


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**Reports**


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OU-3 Construction Completion Report	Submitted to EPA	January 22, 2018
OU-3 Construction Completion Report Addendum	Submitted to EPA <b>Approval Pending</b>	July 27, 2018
OU-3 Operations and Maintenance Plan for Remedial/Corrective Action Projects: Revision 1.0	Submitted to EPA <b>Approval Pending</b>	August 7, 2018
OU-3 Seep Investigation Report	Submitted to EPA <b>Approval Pending</b>	August 31, 2020

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**Work Plan**


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Seep Investigation: Interim Results and Updated Work Plan	Submitted to EPA <b>Approval Pending</b>	November 25, 2019
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## FIGURES



# Composite Map of Residential Sampling and Removals

Anniston PCB Site Consent Decree

## LEGEND

<b>Solutia Composite Samples</b> (by maximum PCB result)	<b>FCP Composite Samples</b> (by maximum PCB result)
< 1 ppm or BDL	< 1 ppm or BDL
1 - 10 ppm	1 - 10 ppm
> 10 ppm	> 10 ppm
<b>EPA Composite Samples</b> (by maximum PCB result)	<b>EPA Grab Samples</b> (by maximum PCB result)
< 1 ppm or BDL	< 1 ppm or BDL
1 - 10 ppm	1 - 10 ppm
> 10 ppm	> 10 ppm
Special Use Property	
Sampled by Solutia and/or EPA with no high activity areas having PCB concentrations greater than or equal to 1 ppm	
Sampled Special Use Property with High Activity Area (HA) > 1 ppm	
Sampling not required due to cap or cover	
Appendix 6 Properties	
EPA Completed Removal Response Properties where PCB results are greater than or equal to 1 ppm	
Solutia Completed Removal Response Properties	
Non-Residential Properties	
Residential Properties Unsuitable for Removal	
Sampling Evaluation Area	
Parcels	
OU-4 100 Year Floodplain	
OU-1/OU-2 Downgradient Floodplain	

## NOTES

"PCB result" is defined as the sum of all arclors for each sample. The maximum value of each parcel is shown in the case of duplicate analyses, multiple analyses, or both.

Precedence: Appendix 6, Removal Response, EPA, Solutia, or Foothills Community Partnership (FCP) Composite, then EPA Grab.

This map presents the maximum value. All data for a specific property may not be apparently visible.

The results shown are from samples validated prior to December 31, 2020.

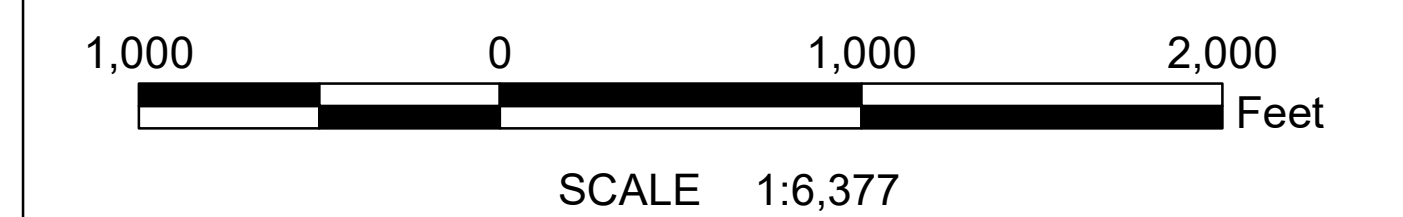
Updates this month:  
Parcel ID 1280: Removal Completed

## SOURCES

Floodplain Revisions:  
Arcadis U.S., Inc.  
Property Parcels:  
Calhoun County Tax Office  
Railroad Lines  
Digital Line Graph 1:100,000 scale (1981)

## SCALE & PROJECTION

NAD 1983 State Plane Alabama East FIPS 0101 Feet



Submitted for  
Solutia Inc. / Pharmacia LLC



December 2020